

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re: Financial Oversight & Management Board for Puerto Rico  <i>as representative of</i>  The Commonwealth of Puerto Rico, <i>et al.</i> .  Debtors	3:17-BK-3283 (LTS)  PROMESA Title III  (Jointly Administrated)
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**NOTICE OF DEFECTIVE PLEADING**  
(Notificación de Documento Defectuoso)

The Clerk of Court has received your pleading on 5/22/2023. However, the deficiencies listed below have prevented us from filing the same in the case docket. You must submit a corrected pleading if you want it to form part of the record.

La Secretaría del Tribunal recibió su escrito el 22 de mayo del 2023. No obstante, las deficiencias que abajo se señalan nos impiden aceptarlo y entrarlo en el sumario del caso. Debe usted someter un escrito debidamente corregido si quiere que el mismo forme parte del expediente.

NOTICE OF DEFECTIVE PLEADING

(Notificación de Documento Defectuoso)

3:17-BK-3283 (LTS)

1		Pleading is illegible. L.Civ.R. 10 <i>(El escrito radicado es ilegible o no cumple con la R.L.Civ. 10)</i>
2		Lacks proper signature. Documents presented to the court in paper require a handwritten signature. L.Civ.R. 11 <i>(Documento no está firmado adecuadamente. Los documentos sometidos en papel tienen que estar firmados a mano. R.L.Civ. 11)</i>
3		PROMESA Cover Sheet for Adversary Proceedings (DPR Modified PROMESA B1040) was not included. L.Bkcy.R. 7003-1 <a href="http://www.prd.uscourts.gov/promesa/forms-attorneys">http://www.prd.uscourts.gov/promesa/forms-attorneys</a> <i>(No se incluyó la Hoja de Trámite para Casos Adversarios (DPR Modified PROMESA B1040).</i>
4		Failure to pay the filing fee in the amount of \$402.00. See, L.Cv.R. 3(a). Payment shall be made within 24 hours in person at the Clerk's Office U.S. District Court with copy of the complaint /notice of removal. <i>(Incumplimiento con el pago de la cuota de radicación por la cantidad de \$400.00. El pago debe hacerse personalmente dentro de 24 horas en la Secretaría del Tribunal Federal de Distrito adjuntando una copia de la demanda / notificación de remoción.)</i>
5	X	The attached document is non-compliant with Fed. R. Civ. P. 5(d)(3)(A) and L. Cv. R. 5(a). Counsel is required to file the document electronically via CM/ECF. <i>(El documento adjunto no cumple con Fed. R. Civ. P. 5 (d) (3) (A) y L. Cv. R. 5 (a). El abogado debe presentar el documento electrónicamente a través de CM / ECF.)</i>
6		Other:

Date: May 24, 2023

ADA I. GARCIA-RIVERA, ESQ.

Clerk of Court

By: s/ Idnar Díaz-García

Idnar Diaz-Garcia

Deputy Clerk

sc: to filer with original filing attached

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

RECEIVED AND FILED

In re: THE FINANTIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PR,  
as representative of

PROMESA  
TITLE III

CLERK'S OFFICE USDC PR  
2023 MAY 22 AM9:46

THE COMMONWEALTH OF PR, et als

No.17-BK-3283-LTS

Debtors

(Jointly Administered)

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In re: THE FINANTIAL OVERSIGH AND  
MANAGEMENT BOARD FOR PR  
as representative of  
PUERTO RICO ELECTRIC POWER  
AUTHORITY,  
Debtor

PROMESA  
TITLE III  
No.17-BK-4780-LTS

MOTION RASING BOTH LEGAL AND CONSTITUTIONAL REMEDIES  
TO HONORABLE COURT:

Comes now Antonio & M Construction Inc. through the attorney  
that subscribed and respectfully alleges and pray:

1. In our case the client made a contract of performance bond  
that cover both work done and payment, therefor, a secured credit.

2. The work done by our client, Antonio & M. Construction Inc.,  
Is considered a “property” because the expression is not limited to “real  
property.” Work is a property and is pay by paper money.

3. The fourteen(14) amendment of the Federal Constitution “pro-

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hibits the states from:

"depriving any person of life, liberty or property without the due process of law." (underlines our).

WHEREFORE: it is formally requested to considered our credit as a secured credit.

At Carolina, Puerto Rico, May 20, 2023.

Certified: notify by mail all parties.

  
IVAN PAGAN  
FID. 116112  
P.O. BOX 8765  
CAROLINA PR.00988  
CEL.787-406-0720